

CORRES. CONTROL
OUTGOING LTR. NO.

DOE ORDER #

97-RF-03379

DIST.	LTR	ENC
BENSUSSEN, STAN		
BRAILS FORD, MARV		
BUHL, TONY		
BURDGE, LARRY		
HARDING, WYNN		
CARD, BOB		
HILL, JOHN		
MARTINEZ, LEN		
OGG, BOB		
PARKER, ALAN		
TILLER, ROBERT		
TUOR, NANCY		
VOORHEIS, GARY		

June 24, 1997

97-RF-03379

Norma Castaneda
ES&H Program Assessment
DOE, RFFO

Hedahl, T. G.		
Anderson, Scott		
Boyd, Russ		
Crowe, Steve		
Detamore, Drew		
Dorr, Kent		
Hahn, Steve		
Hickle, Gordon		
Kennedy, Colburn		
Lahoud, Russ		
Peters, Mike		
Sieben, Ann	X	X
Jhland, Jennifer		

CLARIFICATION OF PLAN FOR EVALUATING WATER TREATMENT ACTIVITIES AT OU7 - AKS-024-97

Please find enclosed the "CLARIFICATION OF PLAN FOR EVALUATING WATER TREATMENT ACTIVITIES AT OU7." Please forward this report to Environmental Protection Agency (EPA) and Colorado Department of Public Health and Environment (CDPH&E) for their concurrence (draft letters enclosed).

Please contact me at X9886 if you have any questions regarding this plan.

BRACKS, L X X

A. K. Sieben
Waste & Remediation Operations

bag

Orig. and 1 cc - N. Castaneda

Enclosures:
As Stated (3)

CORRES. CONTROL	X	X
ADMIN RECD/089	X	X
ATS/T130G		

cc:
J. R. Cirillo - RMRS
N. P. Cypher - "
J. E. Law - "

CLASSIFICATION:		
CNI		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER
SIGNATURE:

Exempt per CEX-266-95

REPLY TO RFP CC NO.:

ACTION ITEM STATUS:

☒ PARTIAL/OPEN
☐ CLOSED

LTR APPROVALS:

ORIG. & TYPIST INITIALS
AKS :bag

Kaiser-Hill Company, L.L.C.

Courier Address: Rocky Flats Environmental Technology Site, State Hwy. 93 and Cactus, Rocky Flats, CO 80007 • 303.966.7000
Mailing Address: P.O. Box 464, Golden, Colorado 80402-0464

CLARIFICATION OF PLAN FOR EVALUATING WATER TREATMENT ACTIVITIES AT OU7

This information is provided in response to questions regarding water treatment activities at Operable Unit #7 (OU7) and the proposed study to determine whether the treatment system could be discontinued or managed in a more efficient fashion. Two issues requiring clarification are the purpose of sampling the landfill pond and the breakdown of costs that are specific to the carbon change out process.

The effluent from the treatment system travels approximately twenty yards on the ground surface prior to entering the Landfill Pond. Sampling results in the Landfill Pond that indicate the presence or absence of volatile organic constituents at levels above the Action Level Framework (ALF) Practical Quantitation Limits (PQLs) may be important when determining whether the treatment system is attaining ARARs to the "maximum extent practicable". It should be noted that the ALF Surface Water Action Level for vinyl chloride is the same as the PQL. Attainment of ARARs to the maximum extent practicable is required by the OU7 Interim Measure/Interim Remedial Action (IM/IRA) Document, Rocky Flats Cleanup Agreement (RFCA), and the Implementation Guidance Document (IGD).

Utilizing the current management structure of Operable Unit #7, up to 8 drums of carbon will be changed out each year. This assumes that vinyl chloride breakthrough at PQLs is not used to trigger carbon change out. Although data is limited, the assumption that carbon change out will be required weekly is still potentially valid if vinyl chloride is used to trigger carbon change out. Based on these assumptions and Table 2, the following Table indicates the range of possible costs for the OU7 carbon changeout:

TABLE 1 - CARBON CHANGEOUT COSTS FOR OU7

<u>Action</u>	<u>Yearly Cost</u>
1. No treatment	\$0
2. Treatment with change out not triggered by vinyl chloride at PQLs (8 drums/yr).	\$30,800
3. Treatment with change out triggered by vinyl chloride at PQLs (52 drums/yr).	\$200,200

TABLE 2 - ITEMIZED CARBON CHANGEOUT COSTS (PER DRUM)

<u>Item</u>	<u>Hours</u>	<u>Approximate Cost</u>
H&S support	5 hours	\$250
Laborer	5 hours	\$250
Confined Space Worker	5 hours	\$250
Waste Coordinator	3 hours	\$165
Project Manager	2 hours	\$110
Sample Coordinator	3 hours	\$150
Trucking	1.5 hours	\$82
Procurement	0.5 hours	\$28
Drum		\$40
PPE		\$25
Replacement Carbon		\$250
Disposal Costs		\$750
Storage Costs		\$1000/yr
Characterization		\$500
Total cost to change out one drum (includes first year of storage)		\$3850

Notes: Other indirect costs such as retrieval equipment/certification, work package planning, waste tracking, and monitoring equipment (combustible gas indicator) are not reflected above. Subcontractor labor rate of \$50/hr and contractor labor rate of \$55/hr were used above.

Tim Rehder
EPA
999 18th Street
Suite 500
Denver, CO 80202

CLARIFICATION OF PLAN FOR EVALUATING WATER TREATMENT ACTIVITIES AT OU7

Please find the enclosed attachment "CLARIFICATION OF PLAN FOR EVALUATING WATER TREATMENT ACTIVITIES AT OU7" in response to your letter of June 11, 1997.

Please contact Russ Cirillo at 966-5876 if you have any questions regarding this plan.

Contact
Title

cc:
J. R. Cirillo - Bldg. T891B
N. P. Cypher - Bldg. 374
J. E. Law - Bldg. T893A

Carl Spreng
CDPH&E
4300 Cherry Creek Drive South
Denver, CO 80220-1530

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